



August 26, 2015

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90**  
**Comments of RCN Telecom Services (Lehigh) LLC**  
FRN: 0019653450

RCN Telecom Services (Lehigh) LLC ("RCN") submits these comments in response to the Wireline Competition Bureau's (the "Bureau") Public Notice<sup>1</sup>, publishing its preliminary determination of rate-of-return study areas that are 100 percent overlapped by unsubsidized competitors. The Public Notice included a list of the study areas preliminarily determined to be subject to a 100 percent overlap (the "Preliminary Determination List"). The Preliminary Determination List included the 170175 study area served by Ironton Telephone Company ("Ironton"), which is also served, in part, by RCN. For the reasons set forth herein, RCN submits that the Bureau's determination appears to be incorrect to the extent that the Bureau relies only on the RCN deployment file and assumes that RCN served blocks constitute a 100% overlap with Ironton. RCN conducted a review and confirmed that it does not offer service to all possible locations within the blocks in RCN's deployment file.

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<sup>1</sup> Public Notice, DA 15-868, released July 29, 2015.

For the foregoing reason, RCN respectfully requests that its presence in study area 170175 should not be determinative that the study area belongs on the final list of study areas subject to a 100 percent overlap.

If you require further information, please contact me at [cwrightman@tminc.com](mailto:cwrightman@tminc.com) or 407-740-3002 or Joseph Kahl at RCN, [joseph.kahl@rcn.net](mailto:joseph.kahl@rcn.net).

Respectfully submitted,

/s/ Connie Wightman

Connie Wightman,  
Consultant

Date: August 26<sup>th</sup>, 2015

cc: Joseph Kahl